

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

**Trans-Radial Solutions, LLC,**

*Plaintiff,*

**v.**

**Burlington Medical, LLC *et al.*,**

*Defendants.*

**Civil Action No. 2:18-cv-00656**

**NOTICE REGARDING MOTION TO COMPEL**

Plaintiff Trans-Radial Solutions, LLC (“TRS”), by counsel, provides this notice to supplement its Motion to Compel. *See* D.E. 40, 41. On July 3, 2019, TRS moved to compel discovery responses after defendants Burlington Medical, LLC and Phillips Safety Products, Inc. failed to serve any objections (due June 6, 2019) or responses (due June 21, 2019). TRS explained that, after the deadline for objections but one day before the deadline for responses, Burlington and Phillips requested an extension of time until July 5, 2019 for both objections and responses. *See* D.E. 41-7. TRS did not consent to an extension on objections, but responded that it could consent to an extension on responses until July 5, *provided* that defendants agreed to begin a rolling document production by at least June 28. *Id.* Defendants did not do so.

The purpose of this notice is to confirm that the July 5 deadline that defendants themselves proposed has now passed, and defendants still have not served any objections, answers, or responses to TRS’s interrogatories, document requests, and requests for admission.<sup>1</sup>

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<sup>1</sup> Plaintiff’s Memorandum inadvertently states that the defendants appeared for a hearing on June 29, 2019. However, the date of the hearing was June 27, 2019. D.E. 41-5.

Dated: July 8, 2019

**TRANS-RADIAL SOLUTIONS, LLC**

By: /s/ W. Ryan Snow  
Of Counsel

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that on this 8th day of July 2019, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send a “Notice of Electronic Filing” to all attorneys of record who have consented to accept service by electronic means.

/s/ W. Ryan Snow  
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